

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT PUERTO RICO

|                                   |   |                                  |
|-----------------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA          | : |                                  |
|                                   | : |                                  |
| <b>Plaintiff</b>                  | : |                                  |
|                                   | : | <b>CRIMINAL NO. 19-541 (FAB)</b> |
| <b>v.</b>                         | : |                                  |
|                                   | : |                                  |
| [1] AHSHA NATEEF TRIBBLE, et al., | : |                                  |
|                                   | : |                                  |
| <b>Defendants.</b>                | : |                                  |
|                                   | : |                                  |
|                                   | : | <b>..oOo..</b>                   |

**UNITED STATES OF AMERICA’S MOTION FOR LIS PENDENS**

TO THE HONORABLE COURT:

COMES NOW, plaintiff, the United States of America, through its undersigned attorneys, and respectfully states and prays as follows:

1. On or about September 3, 2019, a Federal Grand Jury returned an indictment charging violations of Title 18, United States Code, Sections 201(b)(1)(A) and (b)(2)(A), 208, 371, 1343, 1346, 1040, 1952(a)(3), 1001, and 1343. *See* Docket No. 3.
2. Forfeiture allegations were included in connection with Counts One, Two, Three, Four and Five of the Indictment, which provide that defendants [1] Ahsha Nateef Tribble, et al., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal constitutes or is derived from proceeds traceable to said violations. On October 4, 2019, a

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Bill of Particulars was filed alleging that the following real estate properties are subject to forfeiture based on the Forfeiture Allegations set forth in the Indictment.

a). All that certain land situated, lying, located and being at 259 Seahorse

Lane, Panama City Beach, Bay County, Florida, to wit:

Real property located at: 259 Seashore Lane, Panama City Beach; Record Card 31453-015-000; Venture Out Travel Trail Lots 1 & 2, Blk. 15; Book 4148, page 302; Date: July 19, 2019; Grantee: Kyle R. Rockwell.

b). All that certain land situate, lying, located and being at 553 Wahoo

Drive, Panama City Beach, Bay County, Florida, to wit:

Real property located at: 553 Wahoo Drive, Panama City Beach; Record Card 30933-396-000; Bay Point Unit 1, Lot 302; Book 4052, page 422; Date: September 28, 2018; Grantee: Donald Keith Ellison.

3. Pursuant to Fla. Stat. § 48.23(1)(a), Lis Pendens - An action in any of the state or federal courts in this state operates as a lis pendens on any real or personal property involved therein or to be affected thereby only if a notice of lis pendens is recorded in the official records of the county where the property is located and such notice has not expired pursuant to subsection (2) or been withdrawn or discharged. The lis pendens is to be entered into the official records of the county where the property is located.

WHEREFORE, the United States of America respectfully moves this Honorable Court to enter an order directing the Bay County of Florida to record a lis pendens upon the above-described properties, giving notice that the properties are subject to forfeiture pursuant to Title 18, United

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States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c) and Rule 32.2(a)

of the Federal Rule of Criminal Procedure.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico this 25<sup>th</sup> day of November 2019.

W. STEPHEN MULDROW  
United States Attorney

*s/ Seth A. Erbe* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this same date, November 25, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/EMF system.

*s/ Seth A. Erbe* \_\_\_\_\_

Seth A. Erbe  
Assistant United States Attorney